DOCUMENT RESUME

ED 321 429 EC 230 047

TITLE Three Year Evaluations for Handicapped Students. Position Statement and Supporting Paper for Position Statement on Reevaluation.

INSTITUTION National Association of School Psychologists, Washington, DC.

PUB DATE Jul 89

NOTE 8p.

PUB TYPE Viewpoints (120)

EDRS PRICE MF01/PC01 Plus Postage.

DESCRIPTORS *Disabilities; *Educational Diagnosis; Elementary Secondary Education; *Evaluation Methods; Evaluation Needs; Intervention; Mainstreaming; *Nongraded Student Evaluation; *Psychological Evaluation; *Student Evaluation

IDENTIFIERS *National Association of School Psychologists

ABSTRACT

The National Association of School Psychologists' position on 3-year evaluations for handicapped students calls for a flexible, individualized approach to student evaluations, rather than a standardized testing system. Specific issues to be addressed by these evaluations are discussed, including effectiveness of the student's individual education program, appropriateness of current interventions, and current status of eligibility for special education. Factors such as age, severity of handicap, and other sources of information available to the evaluation staff are also addressed. The primary goal of special education is considered to be transition by the student into mainstream educational institutions whenever possible. (PB)

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Position Statement

Three Year Evaluations for Handicapped Students

Three-year reevaluation of students in special education placements is a critical assessment concern of school psychologists. Reevaluations are often mechanical, bureaucratic processes which do not address the unique needs of students. Specific problems with current reevaluation practices include excessive emphasis on reestablishing eligibility, rote replication of initial evaluation procedures, excessive reliance on unnecessary psychoeducational tests, and a lack of variation in assessment team membership to reflect the unique concerns of the reevaluation.

Federal law and regulations on reevaluations have been misinterpreted by many state and local school systems. State and local policies often require that the same assessment procedures used for initial evaluation be used for reevaluation and/or that "tests" per se must be administered. In fact, although the same assessment "domains" must be addressed, federal law and regulations allow alternative assessment procedures. Reevaluation practices among professionals vary widely due to these state and local interpretations and to varying understanding of the purposes for conducting the reevaluations. A change in the focus and process of reevaluations as conducted in many places is needed in order to serve the best interests of students and to better utilize time and skills of involved school personnel.

NASP supports, and federal regulations allow, a flexible approach to three-year reevaluations based on the unique needs of the student and the specific questions that need to be answered. Federal guidelines and professional standards call for meaningful, individualized, multifaceted reevaluations which serve the best interests of students. The following factors should be considered in conducting and in shaping the nature of reevaluations:

*** The purposes and specific questions for reevaluation should guide the selection of assessment methods. Three board purposes of reevaluation are: 1) evaluating the effectiveness of the student's individual education program, 2) evaluating the appropriateness of the student's current interventions and determining his/her future needs, and 3) determining whether the student continues to be eligible for special education services.

*** Additional factors influence the choice of specific assessment procedures, including the student's age, severity and nature of handicap(s), progress in school, years in special education, availability of data from many sources (e.g., school and home), and the consistency of the results of previous evaluations.

*** Sources of information that may be considered in an assessment include, but are not limited to, review of records, interviews, observations, curriculum-based measures, rating scales, and psychoeducational tests. Some areas of assessment may require procedures from several of these data sources, whereas others may use only one source.

*** When any student is placed in a special education program, the ultimate goal whenever feasible should be that student's return to general education. Exit criteria for special programs should include functional assessment of the student's performance in specific program/placement options. Criteria written solely in terms of initial eligibility standards do not address the best interests of the child.

In order to implement reevaluation processes that are useful in meeting student and program needs, NASP encourages school psychologists, school administrative units, and state education agencies to develop flexible and meaningful approaches to reevaluation. School psychologists have unique training and expertise in assessment, and their knowledge is crucial in the selection of appropriate, reliable, and valid assessment procedures. They should be available to assist the multidisciplinary team in selecting and conducting assessments which address the efficacy and appropriateness of the student's current program, future program needs, and program eligibility. Of primary importance is the need for school psychologists to assist in developing appropriate instructional strategies in general education settings so that handicapped students may successfully return to the mainstream as soon as possible.

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SUPPORTING PAPER FOR POSITION STATEMENT ON REEVALUATION

Background Statement

The three year special education reevaluation is one of the critical assessment concerns of school psychologists throughout the United States. It consumes a large amount of time and often involves routinized assessment practices. In 1986, the National Association of State Consultants for School Psychological Services (NASCSPS) conducted a survey of State Department of Education consultants in school psychology on the issue of reevaluation. Survey results indicated that reevaluations were too mechanical and did not address program effectiveness. They also showed little consistency regarding reevaluation procedures among states.

Inconsistencies regarding reevaluation procedures may stem from the different approaches among professionals on the focus of reevaluation, as well as from inconsistencies in the interpretation of PL 94-142 in regard to reevaluation. Some state education agencies interpret P.L. 94-142 reevaluation requirements to mean that the identical types of assessments given for initial evaluation must also be given for reevaluations and that assessment means "testing." Others approach reevaluations based on the child's needs within the legal requirement.

As a basis for the NASP position statement, reevaluation requirements addressed in federal regulations, as well as allowable discretions, are identified below:

1. **"The child is assessed in all areas related to the suspected disability..."** [(PL 94-142, 234 CFR 300.532(f)]

   The law gives examples of areas to assess, such as health, vision, hearing, social and emotional states, communicative status, and motor abilities. It also points out that these areas are to be included in the assessment where appropriate, and only those areas related to the suspected disability must be assessed. These areas should be determined by the multi-disciplinary assessment team in accordance with the handicapping condition, the needs of the child, and the reevaluation questions developed.

   As is the case in initial evaluation, assessment does not necessarily mean "tests." Rather, assessment includes several means of systematic data collection, with "testing" being only one of them. Alternatives to testing may become increasingly important as long term data become available on the student. The method of addressing each of the required components of the comprehensive evaluation necessarily will be unique for each student.

Letters to the states of Maryland and Montana from the U.S. Department of Education's Office of Special Education Programs (OSEP) clarify that reevaluation guidelines, as addressed in the preceding paragraph, are consistent with the requirements of P.L. 94-142.

During initial evaluations, tests may be necessary to identify a particular handicapping condition and/or eligibility for service. However, in the case of reevaluations, identification has already been made and extensive data related to the child's handicap are available.

2. **"The evaluation is made by a multi-disciplinary team or group of persons, including at least one teacher or other specialist with knowledge in the area of suspected disability."** [(PL 94-142, 34 CFR 300.532(e)]

   The make-up of the multidisciplinary assessment team does not consist of the same people for every child. It should be determined by the handicapping condition, the needs of the student, and the reevaluation questions developed. School psychologists should be involved in those assessments for handicapping conditions requiring cognitive, psycho-educational, behavioral, and/or emotional assessment.

3. **"No single procedure is used as the sole criterion for determining an appropriate educational program for a child;"** [(PL 94-142, 34 CFR 300.532(d)]

   Multiple procedures must be used in the reevaluation, but not all procedures used in the initial evaluation are required as part of the reevaluation. Although the same assessment areas must be considered and evaluated, different assessment procedures may be more appropriate. The personnel involved in the assessment determine the procedures in regard to the handicapping conditions, the needs of the student, and the reevaluation questions developed.

Purposes of Reevaluation

In order to develop appropriate reevaluation procedures for any student, specific questions should be formulated based on the general purpose of reevaluation. The "purposes" of reevaluation include:

1. Evaluating the effectiveness of the student's individual educational program including:

   a. Analysis of whether the IEP goals have been successfully accomplished, and

b. Analysis of the appropriateness of the IEP goals.

2. Evaluating the effectiveness of the interventions used with the student and determining needed revisions.

3. Determining whether the student continues to meet the eligibility requirements for special education services.

Evidence is presented at the multidisciplinary meeting concerning specific questions that need to be answered for the student. Reevaluations often stress the child's eligibility for special services, virtually ignoring other important--perhaps primary--purposes of the reevaluation process. Teams must recognize their responsibility to address needs beyond updating student's eligibility for services.

The scope of the reevaluation must be determined by the professionals involved in the assessment of the child. Because various data sources address different needs and questions, and because issues of reliability and validity vary with data sources, psychologists should be involved in the planning of reevaluations where appropriate. Teams should collect data from a variety of sources (see "Assessment Options" below).

Factors to Consider in Determining the Extent of the Reevaluation

Although all reevaluations should be comprehensive, the need for new data will depend on a number of factors. The method of determining the extent of additional reevaluation data will depend upon the needs of each student assessed. However, the following factors may be considered when determining the components of reevaluation necessary to address assessment questions:

1. Age. There is a high probability of change in the initial evaluation results with young children. Additional testing may need to be completed for students in the primary grades or lower when they are reevaluated.

2. Nature of Handicaps. The more definitive (severe) the handicap, the less question there may be of the original eligibility decision, and the reevaluation may need to focus on the effectiveness of the original placement as well as on instructional and programming concerns.

3. Availability of Information. The availability of existing information about a student is an important factor in considering the extent of new data needed. Information should include data such as: group achievement scores, observations, mastery of goals/objectives in the I.E.P., effectiveness of instructional interventions, parent/teacher interviews and ratings, grades, work samples and progress reports.

4. Student's Progress. When the student's progress is not at the expected rate, additional assessments may need to be considered. For example:

   a. A student with mild retardation maintains the same functional skill levels over a two-year period.

   b. A student who has a learning disability makes a two-year gain in his/her deficit area during a one-year period.

5. Number of Years in Special Education. A student due for a first reevaluation has different reevaluation needs and emphases than one who has been in the program for nine years with steady progress and no evidence to support a change.

6. Consistency with Previous Evaluations. If all previously collected data are consistent and agree with the original diagnostic conclusions, there is less need for additional data to confirm eligibility.

Assessment Options

As required by Public Law 94-142, multiple sources of information must be used to determine program needs, but not all sources used in the initial evaluation must be used in the reevaluation. The sources of information used in the reevaluation are determined by the assessment personnel in order to address the purposes and questions of reevaluation.

The reevaluation procedures must assess all areas of the identified impairments; however, it does not necessarily require a readministration of the original tests/procedures. Sources of reevaluation information which may be considered include, but are not limited to, the following:

Review of Existing Information
- a. Prior evaluations
- b. Cumulative School Records - grades, achievement test, attendance
- c. IEP (past and present)
- d. Work samples
- e. Medical information

Interviews/Questionnaires
- a. Teacher
- b. Other school personnel
- c. Parents, other caretakers

d. Student
e. Others involved with the education and care of the child.

Structured and Unstructured Observations

a. Classroom(s)
b. Home
c. Community
d. Other school areas, (such as lunchroom, playground, and halls)
e. Testing situations

Standardized Tests

Curriculum-based measures

Checklists

Rating scales

Projectives

Teacher-made tests

Although the federal rules and regulations do not insist on the administration of a test for reevaluation, it may be appropriate to use tests. The professionals involved in the assessment must use their best professional judgement to select appropriate procedures.

When using alternative methods for conducting cognitive assessments, the factors in determining the extent of the reevaluation should be considered. Systematic data collection, such as record review, interviews, observations, and/or tests may be used to corroborate previous cognitive measures. The professionals involved in the assessment determine whether the information presented on the student's cognitive ability is sufficient for confirming the original classification decision and recommending program and placement.

Conclusion

A change in the focus and process of reevaluation found in most school systems is needed. Federal guidelines and ethical principles call for meaningful, individualized, multifaceted reevaluation which examines and serves the best interests of our children. School psychologists must assist teams in selecting and conducting assessments which address the efficacy of the student's interventions, and future needs for programming and placement, as well as program eligibility.

Of primary importance is the need for school psychologists to assist in developing appropriate instructional strategies and behavior management techniques in general education settings so that handicapped children may return to and be successful in the mainstream whenever possible.